



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 13, 2016

Veronica Semetis Lawless
Regulatory Affairs Specialist
Wellmark International
1501 E. Woodfield Rd. Suite 200W
Schaumburg, IL 60173

Subject: Notification per PRN 98-10 –ABN and Minor changes
Product Name: RF2004 (CCSO)
EPA Registration Number: 2724-504
Application Date: 3/24/2016
Decision Number: 515708

Dear Ms. Lawless:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

The alternate brand name “ZODIAC® Spot On® Plus Flea & Tick Control for Cats & Kittens over 3 lbs. but less than 5 lbs.” has been added to the product record.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Angela Hollis at 703-347-0216 or via email at hollis.angela@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Fry', with a large, stylized flourish or scribble above the name.

Meridith M. Fry, Ph.D., Product Manager 4
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

[] Optional Copy

RF2004 (CCSO)

Alternate brand names:

ZODIAC® Spot On® Plus Flea & Tick Control for Cats 5 lbs. and Over

ZODIAC® Spot On® Plus Flea & Tick Control for Cats & Kittens Under 5 lbs.

ZODIAC® Multi-Cat Spot On® Plus Flea & Tick Control for Cats 5 lbs. and Over

ZODIAC® Spot On® Plus Flea & Tick Control for Cats & Kittens over 3 lbs. but less than 5 lbs.

Include "Cat" in product brand name and font size must be 75% of the size of the largest letter in the brand name

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[For] use ONLY on cats/kittens [over 3 lbs but less than 5 lbs.][and weighing][5 lbs. and over] & 12 weeks of age and older

ONLY For use on cats/kittens weighing [5 lbs and over][> 3 lbs but < 5 lbs][over 3 lbs but less than 5 lbs] & 12 weeks of age and older

(General/Protection claims)

1 ml [cc] [0.034 fl oz] only for cats/kittens (12 weeks of age and older) over 3 lbs but less than 5 lbs.; 1.8

ml [cc] [0.061 fl oz] only for cats 5 lbs. and over

Do not use more than one tube per cat

Flea & Deer Tick [Protective] only for cats [& kittens (12 weeks of age and older)]

[Flea & deer tick] treatment only for cats [& kittens (12 weeks of age and older)]

[Special formula only for cats/kittens (12 weeks of age and older)][Superior flea prevention and treatment specially formulated only for use on cats and kittens (12 weeks of age and older)]

Spot On [Topical][Non-systemic] treatment only for [cats/kittens (12 weeks of age and older)]

Spreads [over time] with cat's movement (skin and hair oils)

Flea, Deer Tick, and Mosquito Treatment [Control][Prevention][Relief] only for Cats & Kittens (12 weeks of age and older)

4 in 1 Control [Protection][Treatment] (Fleas, Flea Eggs, Deer Ticks, and Mosquitoes)

5 in 1 Control [Protection][Treatment] (Fleas, Flea Eggs, Flea Larvae, Deer Ticks, and Mosquitoes)

[1 month][monthly][flea, deer tick, & flea egg] protection

Monthly treatment for [fleas, flea eggs, & deer ticks]

Flea [and deer tick][and mosquito] control only for your cat/kitten (12 weeks of age and older)

A smart approach to flea control

[Brand] Provides a novel [smart] approach to flea, deer tick, and mosquito control

Improved flea, deer tick, and mosquito control

Keeps fleas, deer ticks, and mosquitoes under control

[Advanced] Spot On [Plus] Insect Control [Treatment and Prevention]

A flea control program

Controls flea, deer tick, and mosquito problems [only on your cat/kitten (12 weeks of age and older)]

Pet assured flea, deer tick, and mosquito protection

Provide your cat with flea, deer tick, and mosquito protection, right from the start

Direct on-animal protection from fleas, deer ticks, and mosquitoes

Provides relief [protection] from fleas, deer ticks, and mosquitoes

Once-a-month [topical][Spot On] protection from fleas, and deer ticks,

Reapply monthly [Suitable for year-round use][Month][sticker for home calendar]

Monthly application for most effective protection

When it comes to fleas and deer ticks, there's no room for compromise [Brand Name]

[Satisfaction guaranteed or your money back] [money back guarantee]

NOTIFICATION

2724-504

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

05/13/2016

(Kills/Repels/Controls claims)

[Actively] Kills [Controls] [adult] fleas, deer ticks, [larvae], and flea eggs for [up to][4 weeks][1 month][per application]

[Actively] Kills [fleas][deer ticks][flea eggs][larvae][&][and][mosquitoes][by contact]Kills [and/or Repels] mosquitoes [for up to 28 days][by contact]

[Protects for up to [Four/4] Weeks][One month][Flea][Deer Tick][Mosquito] Treatment [1 month][monthly][flea, deer tick, & flea egg][protection]

Controls fleas, deer ticks, and mosquitoes & prevents flea reinfestations

[Kills deer ticks] (for up to 1 month [4 weeks]) [per application]

Starts killing fleas in 15 minutes

Starts working [on/by] contact

[Kills adult fleas, deer ticks, mosquitoes, flea eggs and flea larvae][Dual protection (against fleas and deer ticks)]

[Dual action kills adult fleas and prevents flea development]

Protects your [cat][kitten (12 weeks of age and older)] from fleas, deer ticks, and mosquitoes (which may transmit heartworm)

Effectively controls fleas, deer ticks, and mosquitoes

Kills [Controls] deer ticks that may transmit [[Lyme disease][and Cytauzoonosis] for up to [1 month][4 weeks]

Protect your [cat] from [against] deer ticks that may transmit Lyme disease

Kills [and repels] mosquitoes that may transmit heartworm

Prevents mosquitoes from feeding on cats

Kills fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation

Preventative treatment for fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation

Controls fleas, deer ticks, and mosquitoes that cause highly irritating [insect] bites

(More general claims)

[All text below represents one label statement with any selected line]

[Protect your family and cat from:]

[When your cat has fleas and ticks, your family and cat/kitten may be exposed to:]

Fleas that may cause:

[Flea allergy dermatitis]

[Flea bite anemia]

[Tapeworm infestation]

Deer ticks which may carry: Lyme disease

[Zodiac] protecting pets for over 35 years

(Flea egg/life cycle claims)

[Plus][Contains][With] PRECOR® [vIGRen®][S-Methoprene][*InfestStop™], the first insect growth regulator for flea control

Contains [Features][*InfestStop™] an Insect Growth Regulator (IGR) to inhibit the development of flea eggs

Flea control for cats with [PRECOR®][vIGRen®] [*InfestStop™] Insect Growth Regulator (IGR)

[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle [at the egg stage]

[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) prevents the development of flea eggs into adult fleas and [inhibits the development of flea eggs into adult fleas]

Controlling flea reproduction is the first step in controlling flea populations on your cat/kitten

[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) prevents flea reinfestation on your cat/kitten

Flea treatment and preventative with an [insecticide] adulticide and [*InfestStop™] Insect Growth Regulator (IGR)

[With [S-Methoprene][*InfestStop™] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

[Contains [*InfestStop™] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [1 month][30 days][4 weeks]

Kills [Controls] flea eggs for up to [30 days][1 month][4 weeks][per application]

Kills flea eggs, the source of home flea infestations and pet re-infestations, for up to [30 days][1 month][4 weeks]

[Kills][Prevents][Keeps] flea eggs from hatching for up to [30 days][1 month][4 weeks]

Prevents flea eggs from developing into biting adults for up to [30 days][1 month][4 weeks][per application]

An effective flea topical [A Spot On] product that kills adult fleas and halts the development of flea eggs [immature stages in the flea life cycle]

Kills [flea] eggs before they hatch into biting adults

Prevents re-infestation for up to [1 month][30 days][4 weeks]

Kills hatching [developing] flea eggs

Interrupts normal flea development [Stops the flea life cycle]

Interrupts the flea life cycle

Breaks the flea life cycle for up to [1 month][4 weeks][30 days]

Controls [Kills][Lasts][Works][Protects] flea infestations for up to [1 month][4 weeks][30 days]

One-two punch controls fleas and flea eggs

Controls existing fleas and flea eggs, plus [and][prevents] future flea infestations

Plus kills flea eggs and larvae to prevent future infestations

*S-Methoprene (Must occur on same panel wherever InfestStop™ is used)

(Application claims)

[#] pack [# days] [#] doses [1/2/3/4/5/6] months supply

One tube gives [1 month][4 weeks] of protection

[Pre-measured][Convenient][and][&][No mess][easy][simple] to [use][handle][apply] disposable applicator [tube]

Convenient [and effective], once-a-month [liquid][topical][Spot On] solution

Practical solution

Simple choice [flea & deer tick control]

A [One] simple application provides your cat with protection for up to [1 month]

Apply to one spot for head to tail (total body) flea protection [control]

Apply to 1 spot - spreads over the cat's [entire] body [from head to tail] through [ordinary][innate][native] skin oils

Spreads [over time] with cat's [ordinary][innate][native] skin oils

[Plus] Contains a [biologically sourced] coat conditioner

[Once][One] Monthly Application

Easy to use [once] monthly application [liquid] prevents [and controls] fleas [& deer ticks]

Reapply [Repeat] [once] monthly

Repeat [treatment] every month

Monthly Control [Relief][treatment]

(Applicator claims)

Unique Applicator [tube] Shape [Design][helps prevents misuse on dogs][helps prevents misapplication on dogs]

Unique shape [for cats & kittens (12 weeks of age and older) 5 lbs and over] for cats & kittens (12 weeks of age and older) over 3 lbs but less than 5 lbs]

Pet Specifix® Applicator Accu-Tip Dispenser

[X] Pro-cision Flo™ Applicators [tubes]

[Exclusive][Pinpoint][Applicator] for [pinpoint][exact][direct][easy][direct to skin] application

Patent pending

For pinpoint accuracy

Direct to your cat's skin

Easily penetrates hair

The [Pro-cision Flo™][exclusive][applicator [tube][easily penetrates hair][fur][coat] for [improved][direct]

application [directly to your cat's skin]

Easy to apply [identify][use] applicator [tube]

Cat head shape [applicator][tube] for cats [cat head = cats]

The right choice [applicator][tube] for the right pet

Make [Select] the right choice [applicator][tube][shape]

Choice [selection] is simple

Easy choice

Simple choice delivery system

Easy to use applicator [tube] [provides direct on-animal protection]

Longer Applicator [tube][tip] for easy application [to long-haired cats]

Longer tube [applicator][tip] is ideal for long-haired [cats]

Helps Prevent [misapplication on dogs] misuse on dogs with unique [specially designed] applicator [tube] design

Cat head shape prevents misuse [misapplication][on dogs]

Unique tube [applicator] design (cat shape) helps prevent misuse/misapplication [on dogs]

EZ-squeeze [Easy squeeze] tube [applicator][shape]

(Product Claims)

Odorless

Clean fresh scent

Effective Control [Relief][Prevention]

Fast [Quick] acting [Relief]

Starts working by contact

Dual-action for immediate and long-lasting effects

Quick acting, long lasting [treatment]

Long lasting and easy to use [apply]

[Flea prevention] Helps stop itching and scratching [from flea bites]

Thermoform claims

[disposable] [liquid dispensing] tube [cartridge][vial]

[brand name][disposable][liquid dispensing] [tube][vial] tip [helps][to] spread out liquid [on your][cat/kitten]

Unique [cartridge] [tube][vial] with flow control

[no mess][application][tube][cartridge][vial]

Promotional Package Copy

One month [dose] free

One free month supply [dose] included

Bonus pack

(Brand claims)
 [Brand] protecting pets for over 30 years
 We (Brand) put(s) your pet(s) first
 [Brand] putting (your pet) pets first
 Right choice = best defense
 Perfekt choice
 [Brand] – caring & committed
 [Brand] makes the choice simple

(IGR claims)
 From ZODIAC®, the originator of Insect Growth Regulator [IGR] technology
 [Plus][Contains][With] PRECOR® [vIGRen®], the first insect growth regulator for flea control
 Contains [Features] an Insect Growth Regulator (IGR) to inhibit the development of flea eggs
 Flea control for cats with [PRECOR®][vIGRen®] Insect Growth Regulator (IGR)
 [(S)-Methoprene] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle at the egg stage
 [(S)-Methoprene] Insect Growth Regulator (IGR) prevents the development of flea eggs into adult fleas [inhibits the development of flea eggs into adult fleas]
 Controlling flea reproduction is the first step in controlling flea populations on your cat and in your home
 [(S)-Methoprene] Insect Growth Regulator (IGR) prevents flea reinfestation on your cat and in your home
 Flea treatment and preventative with an [insecticide] adulticide and Insect Growth Regulator (IGR)

(Formula claims)
 Etofenprox provides a novel [smart] approach to flea, deer tick, and mosquito control
 Advanced Formula [only for cats & kittens]
 Features [Contains] an [insecticide] adulticide to kill [and/or][control] adult fleas [deer ticks, and mosquitoes]

(Prevention claims)
 Preventing fleas and deer ticks from infesting your cat is much easier than treating an existing problem
 Flea prevention has never been easier
 An excellent preventative, offering protection against fleas
 Prevents flea, deer tick, and mosquito infestations
 Prevents flea recurrence
 Control flea infestations by preventing them
 Flea prevention is the best flea control strategy
 Quick and sure flea, deer tick, and mosquito prevention
 A quick and sure way to avert a flea problem is to [prevent it] use a preventative
 It is far easier to prevent fleas than to control them
 Flea control involves [requires] preventative measures [only for your cat/kitten (12 weeks of age and older)]
 [[Year-round][Flea Treatment][Preventative]
 Use a flea preventative year-round (to prevent painful bites, itching and scratching, discomfort)

(FRONT PANEL)

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS # 65733-16-6) 3.6%
 Etofenprox (CAS # 80844-07-1)..... 40.0%

OTHER INGREDIENTS:..... 56.4%
 Total 100.0%

KEEP OUT OF REACH OF CHILDREN
 See back panel for additional Precautionary Statements

EPA Reg. No. 2724-504
 EPA Est. No.

Net Contents:
Lot Number:

[Specially formulated only for cats [& kittens (12 weeks of age and older)]] [For use only on cats [& kittens (over 12 weeks of age)]] [Do not use on other animals]

INTRODUCTION:

[RF2004CCSO is a topically applied [long-lasting] product specifically formulated only for cats and kittens with [containing] [it also contains] an insect growth regulator (IGR)[S-Methoprene][to prevent and control flea infestations][to kill fleas before they hatch][which prevents flea eggs from maturing into biting adults]. It [This product] also contains the highly effective flea, deer tick, and mosquito killing agent [Etofenprox][Brand Name], which kills biting adult fleas, deer ticks, and mosquitoes your cat may acquire from its surroundings. A single application of RF2004 (CCSO) will provide egg hatch inhibition for up to 30 days [1 month][4 weeks]. Each package contains enough product for xx monthly applications (xx days of protection [control]). RF2004 (CCSO) provides relief from flea infestations for up to 1 month [4 weeks] by killing adult fleas on your cat or kitten and flea eggs in your home. Adult fleas can live on your cat while producing vast numbers of eggs, which drop off your cat and develop in the surrounding environment. Normal insecticides will not kill the flea eggs, but RF2004 (CCSO) [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat relief from flea bites at the same time.

After application, your cat's [ordinary][innate][native] skin oils [disperse] carry RF2004 (CCSO) over your cat's body for protection against biting adult fleas and the development of flea eggs. [(product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat, there is likely an infestation of flea eggs and flea larvae in your home. To completely kill the existing flea population, you may need to treat your home and your cat's bedding (home sprays, foggers), as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on cats, around the home, or in your yard. RF2004 (CCSO) can be used in conjunction with other ZODIAC [HARTZ®] premise products. As with all flea products, they are [RF2004 (CCSO) is] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's environment. ZODIAC [HARTZ] products [They] are designed to complement each other in an integrated program for flea, deer tick, and mosquito management. To assure proper treatment, we recommend use of ZODIAC [HARTZ] products as directed to treat all pets in the household, as well as the indoor and outdoor home environments.]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

IMPORTANT! READ ENTIRE LABEL BEFORE EACH USE. FOR USE ONLY ON CATS OR KITTENS (12 WEEKS OF AGE OR OLDER). DO NOT USE ON CATS OR KITTENS LESS THAN 3 POUNDS 5 POUNDS or 12 WEEKS OF AGE. DO NOT USE ON OTHER ANIMALS!

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USE RESTRICTIONS

- For indoor use only.
- Apply this product once every 30 days. Do not retreat more than once per month.
- Do not apply this product to cats or kittens less than 3 pounds 5 pounds and/or less than 12 weeks of age.
- [(For the 3 lb. to < 5 lb. product) Do not apply to cats/kittens weighing less than 3 lbs.]
- [Do not apply to cats weighing less than 5 lbs.]
- Do not get this product in your cat's/kitten's eyes.
- Do not allow your cat/kitten to ingest this product.
- Do not use more than one applicator per cat/kitten and do not apply more than once per month.

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[This product contains xx monthly dosages [one monthly dose], each [0.034 fl oz and 0.061 fl oz (1 and 1.8 ml [cc])].

[1 ml [cc] [0.034 fl oz] dose for use ONLY on cats/kittens (12 weeks of age and older) over 3 lbs but less than 5 lbs.

1.8 ml [cc] [0.061 fl oz] dose for use ONLY on cats and kittens (12 weeks of age and older) and 5 lbs. and over (Same size applicators with different fill amounts)]

[APPLICATION METHOD]

[Bend at perforation and tear off 1st month's applicator.] Hold [applicator] upright [and bend area of plastic at perforation, tear off and discard.] [Hold applicator upright] and snap tip back, away from face and body. Prior to application of the product, gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [applicator] tube on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 1 (CAT-HEAD APPLICATOR)

[Bend at perforation and tear off 1st month's applicator.] Hold [applicator] upright and bend numbered area of plastic at perforation, tear off and discard. Hold applicator upright away from face and body and use scissors to cut secure seal applicator tip. Prior to application of the product, gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [applicator] tube on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 2

Remove one applicator tube from the package and hold in an upright position (pointed away from your face). Hold bottom of tube with one hand. With other hand, snap cap off. Prior to application of the product, gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [applicator] tube on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 3 (for new subregistrant ampoule openings)

1. Remove one applicator [tube] from the package and hold in an upright position pointed away from your face.
2. Twist dispensing tip clockwise about ½ turn while pushing down to break the applicator's [tube's] seal. Do not remove the dispensing tip.
3. Prior to application of the product, using the dispensing tip of the applicator [tube], gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the dispensing tip of the applicator [tube] on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried.
4. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 4 (for new subregistrant ampoule openings)

1. Remove one applicator [tube] from the package and hold in an upright position pointed away from your face.
2. Twist dispensing tip clockwise about ½ turn until you feel it click into place. Do not remove the dispensing tip.
3. Prior to application of the product, using the dispensing tip of the applicator [tube], gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the dispensing tip of the applicator [tube] on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried.
4. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 5 (for new subregistrant ampoule openings)

1. Remove one applicator [tube] from the package and hold in an upright position pointed away from your face.
2. Squeeze the middle of the dispensing tip at the grooved pad to break the inner seal. Do not remove the dispensing tip.
3. Prior to application of the product, using the dispensing tip of the applicator [tube], gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the dispensing tip of the applicator [tube] on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried.
4. Repeat application once monthly.

ALTERNATE PACKAGING DIRECTIONS 6

1. Remove one applicator tube from the package and hold in an upright position pointed away from your face.
2. Pull off cap. Turn the cap around and place on top of tube.
3. Simply press cap down to break the seal of tube. Remove cap carefully.
4. Prior to application of the product, gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the tube on the cat's exposed skin and squeeze out the entire contents of the tube onto the cat's skin. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried.
5. Repeat application [once every month][once monthly].

STORAGE AND DISPOSAL: Pesticide Storage: Store in a cool, dry (preferably locked) area that is away from children and animals. Do not store unused applicators [tubes] separately from their packaging.

Container Disposal: If empty: Do not reuse empty applicator [tube]. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS: Repeated exposure to etofenprox can cause skin irritation.

HAZARDS TO ANIMALS: For External Use on Cats Only. **Do not use on kittens less than 12 weeks old or less than 3 pounds (5 pounds).** Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your cat/kitten with mild soap and rinse with large amounts of water. If signs continue, [please call 1-800-phone number or] consult a veterinarian immediately. Due to the bitter taste of the product, oral exposure could result in salivation. Be careful not to get any product in the cat's mouth during application. For multiple cat households, prevent the cats from grooming each other until the product has dried. If the salivation continues or other clinical signs are noted, please call 1-800-number.

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Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

In case of an emergency or for product use information, call [phone number] or visit our Web site:

www.zodiacpet.com
adamsfleacontrol.com

To appear on the back panel:

SIDE EFFECTS: Monitor your cat after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [Brand at 1-800-number]

Wellmark International
1501 East Woodfield Road 200W
Schaumburg, IL 60173
Made in USA

PRECOR® Insect Growth Regulator, vIGRen® Insect Growth Regulator, and ZODIAC® are registered trademarks of Wellmark International.

Adding a Dose Reminder section to appear as follows on the back panel:

First Monthly Application: Month _____ Day _____ Year _____
Second Monthly Application: Month _____ Day _____ Year _____
Third Monthly Application: Month _____ Day _____ Year _____
[Fourth Monthly Application: Month _____ Day _____ Year _____]

Optional marketing text for subregistrant

[TREATMENT SCHEDULE]

Dosage: 1 applicator every 30 days per cat

Cat's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

NOTES: _____

REMINDER: I purchased [Brand Name] _____ from _____]

To learn more about treating current infestations and preventing future outbreaks, please, visit our website: www.zodiacpet.com
adamsfleacontrol.com

[For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents) you may call 1-xxx-xxx-xxx, twenty four (24) hours per day, seven (7) days per week. To learn more, visit www.zodiacpet.com
adamsfleacontrol.com

TEXT FOR LIQUID TUBE/CARTRIDGE/VIAL/Applicator:

Product Name
Etofenprox 40%, S-Methoprene 3.6%
KEEP OUT OF REACH OF CHILDREN
Use ONLY on cats/[kittens] (12 wks of age and older &) [weighing](5 lbs & over) (over 3 lbs but less than 5 lbs)
[READ ENTIRE LABEL BEFORE EACH USE] (OPTIONAL if space permits)
EPA Reg No. 2724-504
Net Contents
Lot Number:
[US Patent No. _____]